



REC'D THE  
REGULATORY AUTH.

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December 14, 1999

**BY HAND DELIVERY**

David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: *Petition of the Tennessee Small Local Exchange Company Coalition for  
Temporary Suspension of 47 U.S.C. §§251(b) and 251(c) Pursuant to 47 U.S.C.  
§251(f) and 46 U.S.C. § 253(b)*  
Docket No. 99-00613

Dear Mr. Waddell:

Pursuant to the Notice of Pre-Hearing Conference, dated December 6, 1999, enclosed are the original and thirteen copies of AT&T's List of Proposed Issues. If you have any questions, please do not hesitate to call me.

Sincerely,

Jim Lamoureux

Encls.

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**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY**  
Nashville, Tennessee

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In Re: Petition of the Tennessee Small )  
Local Exchange Company Coalition For )  
Temporary Suspension of 47 U.S.C. )  
§251(b) and 251(c) Pursuant To 47 U.S.C. )  
§251(f)(2) and 47 U.S.C. §253(b) )

Docket No. 99-00613

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EXECUTIVE SECRETARY

**AT&T'S LIST OF PROPOSED ISSUES**

AT&T Communications of the South Central States, Inc. ("AT&T"), pursuant to the December 6, 1999, Notice of Pre-Hearing Conference, respectfully submits the following List of Proposed Issues for the TRA's consideration in this proceeding.

**AT&T'S LIST OF PROPOSED ISSUES**

1. Should the TRA reject the Coalition Petition (or any petition of any of the individual members of the coalition) because the Coalition and its members have not demonstrated that suspension or modification of any provision of the federal Act is necessary:
  - a) to avoid a significant adverse economic impact on users of telecommunications services generally;
  - b) to avoid imposing a requirement that is unduly economically burdensome;  
or
  - c) to avoid imposing a requirement that is technically infeasible;  
as required under § 251(f)(2)(A) of the Act?
2. Should the TRA reject the Coalition Petition (or any petition of any of the individual members of the coalition) because the Coalition and its members have not demonstrated that application of §§ 251(b) or 251(c) of the Act would be

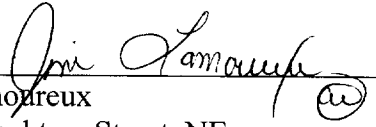
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likely to cause undue economic burden beyond the economic burden that its typically associated with efficient competitive entry, as required under 47 C.F.R. § 51.405(d)?

3. Should the TRA reject the Coalition Petition (or any petition of any of the individual members of the coalition) because the Coalition and its members have not demonstrated that suspension or modification of any provision of the federal Act is consistent with the public interest, convenience, convenience, and necessity of Tennessee, as required under § 251(f)(2)(B) of the Act?

AT&T's List of Issues is based on the Coalition Petition, the Act, and the FCC's rules and regulations. AT&T reserves the right to suggest additional issues as this case proceeds.

Respectfully submitted,

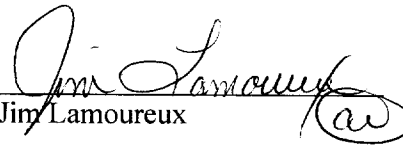
  
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Attorney for AT&T Communications of the  
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December 14, 1999

### CERTIFICATE OF SERVICE

I, Jim Lamoureux, hereby certify that on December 14, 1999, a copy of the foregoing Issues List was served on the following persons, United States Mail, Postage pre-paid addressed as follows, such persons being on the service list shown on the Certificate of Service.

  
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